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*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
ECF CASE

SOKOL HOLDINGS, INC., BRIAN SAVAGE and  
THOMAS SINCLAIR

Plaintiffs,

-against-

BMB MUNAI, INC., ALEXANDRE AGAIAN,  
BAKHYTEBEK BAISEITOV, GEORGES BENARROCH,  
BORRIS CHERDABAYEV, MIGALI KUNAYEV,  
CREDIFINANCE CAPITAL, INC. and CREDIFINANCE  
SECURITIES, LTD.

Defendants.

Case No. 05 CV 3749 (KMW) (DCF)

**DECLARATION OF DEBBIE KLEIN IN SUPPORT OF MOTION FOR INSPECTION  
OF ELECTRONICALLY STORED INFORMATION OF GARY LERNER, ESQUIRE,  
UNDER FED. R. CIV. PRO. 34 AND 45 AND  
FOR PRODUCTION OF A COMPLETE PRIVILEGE LOG**

DEBBIE KLEIN, an attorney admitted to practice in the Courts of the State of New York  
and this Court, affirms under penalty of perjury:

1. I am associated with Dewey Pegno & Kramarsky LLP, co-counsel to Plaintiffs in  
this action. I make this application in support of Plaintiffs' Motion for Inspection of  
Electronically Stored Information of Gary Lerner, Esq. Under Fed. R. Civ. Pro. 34 and 45.
2. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiffs' Notice of  
Subpoena to Gary Lerner, Esq., to Produce Documents and Things, dated February 28, 2008;

Subpoena dated February 28, 2008; Plaintiffs' Notice of Videotape Deposition of Gary Lerner, Esq. dated April 4, 2008; and Subpoena dated April 4, 2008.

3. Attached hereto as Exhibit 2 is a true and correct copy of Exhibit 10 marked at the Deposition of Gary Lerner, Esq. on April 25, 2008.

4. Attached hereto as Exhibit 3 is a true and correct copy of Exhibit 11 marked at the Deposition of Gary Lerner, Esq. on April 25, 2008.

5. Attached hereto as Exhibit 4 is a true and correct copy of Exhibit 8 marked at the Deposition of Gary Lerner, Esq. on April 25, 2008.

6. Attached hereto as Exhibit 5 is a true and correct copy of an April 28, 2008 email from Jerome Marcus, Esq. to Robert Lewis, Esq.

Dated: New York, New York  
April 29, 2008

/s/ Debbie Klein  
DEBBIE KLEIN